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**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH-NORTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL KEVIN RICHARDS,

Defendant.

**MOTION TO APPROVE
OUT OF STATE AND
INTERNATIONAL TRAVEL**

Case No. 2:21-CR-00014

Magistrate Judge Daphne Oberg

The Defendant, Daniel Richards, by and through his attorney, Gregory G. Skordas, hereby moves this court for an order allowing out of state and international travel to Long Beach, California; and then on to Puerto Vallarta, Mazatlan, and Cabo San Lucas, Mexico; then returning to Long Beach, California. The cruise will be departing April 2, 2022, and returning April 9, 2022. The Defendant is traveling with his family for vacation purposes. The Itinerary is attached as Attachment A. The US Probation Office's Travel Request Form is attached as Attachment B.

In support of this motion the Defendant alleges as follows:

1. On or about April 7, 2021, the Defendant pleaded guilty to one count of Receipt of Food or Drug in Interstate Commerce, a violation of 21 U.S.C. 331(c), a class A misdemeanor.
2. The Defendant was sentenced on April 5, 2021 and was placed on probation for three years.
3. The Defendant has maintained compliance with the terms of his probation.
4. The Defendant's probation officer, Alonzo Nez, has indicated that he has no objections to this Motion.

WHEREFORE Defendant moves for him be allowed to travel to Long Beach, California; and then on to Puerto Vallarta, Mazatlan, and Cabo San Lucas, Mexico; then returning to Long Beach, California for family vacation purposes departing April 2, 2022, and returning April 9, 2022.

DATED March 31, 2022.

SKORDAS, CASTON & HYDE, LLC

/s/ Gregory G. Skordas
Gregory G. Skordas

CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022, I caused to be delivered a true and correct copy of the foregoing MOTION TO APPROVE OUT OF STATE AND INTERNATIONAL TRAVEL, and ORDER ALLOWING INTERNATIONAL TRAVEL, to the following:

United States Attorney's Office
111 South Main Street, Suite 1800
Salt Lake City, UT 84111

/s/ Brooke Sloan
SKORDAS & CASTON, LLC